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Secretary John Laird
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA

Subject: Independent Science Panel Review of Bay Delta Conservation Plan (BDCP)

Dear Secretary Laird,

I write on behalf of the Contra Costa Council to echo the concerns expressed by the Independent Science Review Panel (Panel) regarding the adequacy of the Effects Analysis prepared for the Bay Delta Conservation Plan (BDCP). The Delta as a resource belongs to the entire State and it is critical that decisions regarding its preservation be based on the best available science. The Panel's report clearly establishes that more thought needs to be given to protecting this essential resource.

The Contra Costa Council is a non-profit organization comprised of over 400 employers (private, public and institutional) located within Contra Costa County and its neighboring counties. The Council researches various topics of public policy and develops advocacy statements and positions that are of particular interest to our members.

Since 2004 our Council has been engaged on the issues facing the Sacramento-San Joaquin Delta. We have observed and participated in various activities such as the Delta Vision Strategic Plan and now the Delta Plan being developed by the Delta Stewardship Council. We continue to be involved with the various implementation activities. Our observations lead us to be concerned about the development of the BDCP.

Development of any habitat conservation plan will involve proposals that will convert existing uses of land and water to help achieve the co-equal goals of water supply reliability and ecosystem restoration – goals that we support. But those habitat restoration plans must be conceived using the best scientific knowledge. Because of the statewide importance of the Delta, any decision based on anything less than best available science should be considered flawed. Planning shortcuts that do not make full use of the best available science raise concerns about the effectiveness of the conservation plan and thus the BDCP.

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We have reviewed the report prepared by the Independent Science Review Panel (Panel) on the adequacy of the Effects Analysis. In summary, the Panel was critical of the work effort to date and presented 10 conclusions leading to 11 recommendations to BDCP regarding future analyses. The Panel identified a number of concerns about the analysis to date. We note that the Panel raised many issues that suggest that the Effects Analysis and BDCP could be highly uncertain. We appreciate the effort of the Panel to provide critical comments that lead to the use of the best available science on Delta issues. Unfortunately, these are only the latest in a series of reports by independent scientists that are pointing out serious flaws in the BDCP methods, and many of these recommendations merely repeat what the National Research Council Committee pointed out last spring. These repetitive criticisms would indicate that the BDCP is yet to "get the message to do it right" on developing a viable plan that is supportable. We urge the state and all of the BDCP sponsors to seriously heed the conclusions and recommendations presented to you by this Panel as well as those of the National Research Council Committee.

Very truly yours,

Linda Best

President

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